

REMARKS

In the Office Action mailed August 18, 2009, the Office noted that claims 21-23 were pending and rejected claims 21-39. Claims 21 and 18 has been amended, claim 33 has been canceled, and, thus, in view of the foregoing claims 21-32 and 34-39 remain pending for reconsideration which is requested. No new matter has been added. The Office's rejections are traversed below.

REJECTIONS under 35 U.S.C. § 103

Claims 21-29 stand rejected under 35 U.S.C. § 103(a) as being obvious over Hughes, U.S. Patent No. 6,854,009 in view of Cochran, U.S. Patent No. 7,240,106. The Applicants respectfully disagree and traverse the rejection with an argument and amendment.

Hughes discusses a network with multiple servers and multiple distributed client devices each with an operating system. At boot the client connects to one of the servers by whatever means possible and downloads a base operating system and some applications without any user accessible setup. The client may be a thin client, to the extent that there is no hard disk - but there may be flash memory. If there is not, then this ensures that the base operating system must be reloaded each time.

Cochran discusses determining a network address of the computing device.

On page 3 of the Office Action, the Office asserts that Authentication Server 216, Fig. 2; col. 8, lines 43-45 of Hughes disclose "providing a verification authority connected to the internet remote from the two or more network devices and capable of verifying the identity of the two or more internet network devices," as in claim 1.

However, Hughes col. 8, lines 43-45 states "At various times before the downloading is actually performed, the authentication server 216 **verifies that the user is authorized to download files.**" It respectfully submitted that the verification of a user is separate and distinct from the verification of an internet network device. The user can log on from anywhere, for example, any web browser on any machine, not a specific device.

On page 4 of the Office Action, the Office acknowledges that Hughes does not **expressly** disclose "storing the allocated internet network address of the network device at the verification authority," as in claim 21, but further asserts that Cochran col. 8, lines 6, lines 8-31 and col. 15, lines 30-36 does.

Cochran, in the cited text broadly discusses determining the address of a number of devices including the DHCP server 42. The Applicants acknowledge that DHCP servers allocate and store IP address based on a request. However, claim 21 requires that "each of the devices containing configuration information sufficient to contact **a designated internet address**

of the remote verification authority."

On page 3 of the Office Action, it is asserted that "providing each of the two or more network devices having no provision to permanently store the user configuration data, each of the devices containing configuration information only sufficient to connect the devices to an internet service provider to request a first IP address, and using that first IP address to connect to *the remote verification authority at a designated internet address* ... using *the designated internet address of that remote verification authority*," (Emphasis added) as in amended claim 21 is disclosed by Hughes, col. 4, lines 14-17; col. 4, lines 56-65; col. 7, lines 55-64 and the ¶ spanning cols. 7 and 8. Support for the amendment may be found, for example, Fig. 2 element 201 and ¶¶ 0025; and 0032-0035 of the printed publication version of the Specification. The Applicants submit that no new matter is believed to have been added by the amendment of the claims.

However, the Applicants can find no place in Hughes where a particular designated address is assigned to authentication server 216. However, for the sake of argument if one was to assume that authentication server 216 was at a designated address, then one of ordinary skill in the art would not have combined it with the DHCP server of Cochran as a DHCP server (i.e. authentication server as defined by the Office) uses a broadcast query, not a connection to a designated address of an

authentication server. Thus, an authentication server with a designated address would not be combined with a DHCP system that responds to broadcast queries. (See RFC 1531 and 2131 for the definition of DHCP as is well know in the art)

Thus, if Hughes has a designated address of the authentication, which Applicants contend it does not, it would teach away from the combining with a DHCP server as in Cochran which responds to a broadcast query.

Further, neither the authentication server 216 of Hughes nor the DHCP server of Cochran distribute the network address of the client to a third part. Thus, neither reference discloses "subsequently downloading from a remote configuration authority authorized by the remote verification authority the entire configuration data each time the device is initialized," as in claim 21.

Claim 28 has been amended to include the features of claim 33 and further amended in a manner similar to claim 21.

For at least the reasons discussed above, Hughes and Cochran, taken separately or in combination, fail to render obvious the features of claims 21 and 28 and the claims dependent therefrom.

Claims 30-39 stand rejected under 35 U.S.C. § 103(a) as being obvious over Hughes in view of Cochran in view of Weldon, U.S. Patent No. 6,366,563. The Applicants respectfully disagree and traverse the rejection with an argument.

Weldon adds nothing to the deficiencies of Hughes and Cochran as applied against the independent claim. For at least the reasons discussed above, Hughes, Cochran and Weldon, taken separately or in combination, fail to render obvious the features of claims 30-39.

Withdrawal of the rejection is respectfully requested.

SUMMARY

It is submitted that the claims satisfy the requirements of 35 U.S.C. § 103. It is also submitted that claims 21-32 and 34-39 continue to be allowable. It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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